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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated, LESTER WRESCKIE, in an individual capacity and on behalf of themselves and all others similarly situated, and THOMAS DREIER, in an individual capacity and on behalf of themselves and all others similarly situated,

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal corporation,

DEFENDANT.

3:20-cv-00917-HZ

DECLARATION OF NAOMI SHEFFIELD

**(In Support of Defendant City of Portland's
Unopposed Motion to Exceed Page Limit)**

I, Naomi Sheffield, Deputy City Attorney, declare as follows:

1. I am one of the attorneys assigned to represent Defendant City of Portland (“City”). I make this declaration in support of Defendant City of Portland’s Unopposed Motion to Exceed Page Limit.

2. The City has a response to Plaintiffs’ Motion for Class Certification due Wednesday, February 2, 2022. Due to the number of issues raised in Plaintiffs’ brief, the length of Plaintiffs’ brief, and other factual and legal issues related to class certification in this case, I expect our response will require an extended page limit of 75 pages.

3. Counsel for City Defendants conferred with counsel for Plaintiffs on January 26, 2022 via email, and Plaintiffs do not oppose this motion.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: January 26, 2022.

/s/ Naomi Sheffield
Naomi Sheffield